

From: [Bill Jacobs](#)
To: [Lori Dixon](#)
Cc: [Jennifer Gaines](#)
Subject: Re: Dog Testing of Bait Stations
Date: 08/25/2009 03:07 PM

I have looked over these forms, as has Jennifer Gaines, who also will be reviewing test reports.

In general, the forms appear to be suitable. Here are a few suggestions for improving them.

1. The form should clearly indicate the name, design, and/or model number of the bait station tested and also should indicate the specific edible component that is loaded into the bait station. The edible component might be a placebo for the formulation that is to be the bait component of the finished product or an item similar in shape and form to the rodenticide component but formulated so as to be especially attractive to dogs -- thereby increasing both the severity of the test and the potential for generalizing test results to other baits. The form also should be clear where it states "product" whether the reference is to the bait station component, the bait component, or the entire product (station plus bait). The "product removed" entries seem intended to refer to removal of bait from stations, but they also might refer to the dog's relocating the station (as in "Removed product from area") which, by itself, would not be a test failure.

2. Under "Location/surface:", the references are to substrates ("floor", "slab", "grass", "concrete", etc. We presume that the stations are to be placed, unsecured, on those surfaces for testing. As I believe I mentioned to you previously, it would seem to be in your client's best interests to have the bait stations tested in secured condition as well as unsecured. In any event, the form should have blanks for entering whether the unit was secured and, if so, the method by which it was secured.

3. The "Testing Time Log and Details" form should have an entry for "Date:" as well as "Dog #:". Times engaged in various activities can be determined from videos, which probably would be more reliable in that regard than would an observer with multiple stopwatches or an event recorder. However, it's probably a good idea to try to time events as they occur, just in case there is a problem with the video equipment. That having been said, it also is important that there be as little human presence and intrusion as possible in the test situation. Anything that distracts the dog from its "assigned" task of challenging the bait stations runs the risk of having a null ("dud") subject that cannot be used. Superfluous personnel (including the dogs' owners, representatives of the would-be registrant, curious onlookers, etc.) should be banished from the test area. Study personnel (tester and videographer) should not be located in any area to which the dog has physical access during the test and should make every effort not to influence the subject in any way. If the video equipment can be set up such that it does not have to be moved or adjusted locally to capture all of the dog's behavior in the test area, it should be left in place, with the videographer withdrawing from the immediate vicinity of the test area.

Photos of the units at the end of the tests should be included in the reports and, of course, provided to the sponsor as reasons for failures might be addressable via design changes.

▼ "Lori Dixon" ---08/21/2009 08:33:29 AM---I am working with a company to conduct dog resistance of bait stations. We were going to use the att

From: "Lori Dixon" <ldixon@greatlakesmarketing.com>
To: Bill Jacobs/DC/USEPA/US@EPA
Date: 08/21/2009 08:33 AM
Subject: Dog Testing of Bait Stations

I am working with a company to conduct dog resistance of bait stations.
We were going to use the attached forms to collect the data.
Can you review to be sure we are not missing any piece of data you
want collected.
Thanks.
Lori Dixon

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[attachment "Dog Testing Data Sheet.doc" deleted by Bill
Jacobs/DC/USEPA/US] [attachment "Dog Health Form.doc" deleted by Bill
Jacobs/DC/USEPA/US]